IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

CHRISTOPHER META,)
Plaintiff,) CASE NO. 4:14-CV-0832
v.) JUDGE DONALD C. NUGENT
TARGET CORP., et al.	
Defendants.)

JOINT MOTION FOR EXTENSION OF TIME

In accordance with Section 9(e) of the Settlement Agreement, the Parties have until January 25, 2019 to resolve their respective objections to the individual claims determination made by the claims administrator. The Parties jointly request an additional 60 days to complete this process. While the Parties are diligently working to resolve their objections to the individual claims determinations, the holidays and schedules of counsel and the claims administrators have slowed the process of compiling and reviewing the requisite claims information to further these discussions. With additional time to complete these discussions, the Parties believe that they can resolve all objections without the involvement of the Court. This extension will not delay the settlement as Mr. Neumann's objection to the settlement is still pending.

WHEREFORE, the Parties respectfully request that the Court grant this Motion and extend the period the Parties to resolve their objections until March 26, 2019.

¹ This is a separate process from the objection to the settlement itself that has been filed by Mr. Neumann and is currently pending with the Court. This process continues while Mr. Neumann's objection is pending.

Respectfully submitted,

Respectfully submitted,

/s/Andrew J. Silver

asilver@tzlegal.com

dfrech@spanglaw.com

JONATHAN K. TYCKO (pro hac vice)
HASSAN A. ZAVAREEI (pro hac vice)
ANDREW J. SILVER (pro hac vice)
TYCKO & ZAVAREEI LLP
1828 L Street, N.W., Suite 1000
Washington, D.C. 20036
(202) 973-0900
(202) 973-0950 (FAX)
jtycko@tzlegal.com
hzavareei@tzlegal.com

DENNIS R. LANSDOWNE (0026036) STUART E. SCOTT (0064834) DANIEL FRECH (0082737)

DANIEL FRECH (0082737)

SPANGENBERG SHIBLEY & LIBER LLP

1001 Lakeside Avenue East, Suite 1700

Cleveland, OH 44114
(216) 696-3232
(216) 696-3924 (FAX)

dlansdowne@spanglaw.com
sscott@spanglaw.com

Attorneys for Plaintiff Christopher Meta and the Class

/s/Jennifer L. Mesko

JOHN Q. LEWIS (0067235) DUSTIN B. RAWLIN (0072870) KARL A. BEKENY (0075332) JENNIFER L. MESKO (0087897)

TUCKER ELLIS LLP

950 Main Avenue, Suite 1100 Cleveland, OH 44113-7213 Telephone: 216.592.5000 Facsimile: 216.592.5009

E-mail: john.lewis@tuckerellis.com

dustin.rawlin@tuckerellis.com karl.bekeny@tuckerellis.com jennifer.mesko@tuckerellis.com

Attorneys for Defendants Nice-Pak Products, Inc. and Target Corporation

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2019, a copy of the foregoing *Joint Motion for Extension of Time* was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Jennifer L. Mesko

JOHN Q. LEWIS (0067235) DUSTIN B. RAWLIN (0072870) KARL A. BEKENY (0075332) JENNIFER L. MESKO (0087897)

TUCKER ELLIS LLP

950 Main Avenue, Suite 1100 Cleveland, OH 44113-7213 Telephone: 216.592.5000

Facsimile: 216.592.5009

E-mail: john.lewis@tuckerellis.com

dustin.rawlin@tuckerellis.com karl.bekeny@tuckerellis.com jennifer.mesko@tuckerellis.com

Attorneys for Defendant Nice-Pak Products, Inc.